

UNITED STATES FEDERAL COURT  
FOR THE DISTRICT OF MASSACHUSETTS

IN RE: )  
BISASOR, ET AL )  
Bankruptcy Appeal  
Case No.: 1:15-cv-13813 -LTS

**REQUEST FOR EXTENSION OF TIME TO FILE APPELLATE BRIEF**

I, Andre Bisasor, hereby request 65 days of time extension until 4/24/16 to file my appellate brief.

Grounds are as follows:

1. I was blindsided by Mr. Baker's recent filing and motion to withdraw.
2. This court approved his withdrawal in an expeditious manner without first waiting to hear my objection. By the time my objection was filed a couple of days after I received notice of the motion to withdraw, the court had already ruled. This was a harm to me in that I was not afforded appropriate time to respond.
3. This withdrawal has thrown things into disarray.
4. Moreover, the court sent notice to me about the date of 2/19/16 as the new brief due date. Because I was in transition, somehow the court received a bounceback in the mail.
5. Then an assistant clerk called me to inform of the new brief date apparently because of the bounceback in the mail.
6. By the time I received notice of the new brief date, I had lost critical time already.
7. Furthermore, due to the above, I therefore need time to find new counsel and to put together a proper and effective brief.
8. I am also attempting to find new counsel and to get legal assistance with my brief.
9. Given that I am now pro se at this juncture, and because I have to do this by myself on a pro se basis at this juncture, I need time to do this.
10. I am concerned that if I try to do this myself, my rights could be prejudiced given the nature of the matter. I believe I need legal assistance in order to protect my rights. It is difficult for me as a non-lawyer to figure out all of the intricacies of bankruptcy law much less appellate bankruptcy law.
11. Also, I have been engaged in a process of bouncing back from certain setbacks and getting things back on track. It has been difficult to focus on doing that while engaged in this legal process without the assistance of counsel.
12. Therefore, I am asking for 65 days of extension of time until April 24, 2016. This will allow me time to find new counsel and also allow new counsel to get caught up with the extensive litigation record underneath this appeal and then allow new counsel time to prepare an effective brief.
13. In addition, there has also been a settlement negotiation/agreement undertaken by the parties, which if finalized will dispose of the need for further litigation on this matter. This would redound to judicial economy and potentially save on the resources of the court and the parties.

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U.S. DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
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WHEREFORE, I hereby humbly request this Honorable Court grant my request and/or other relief that the Court deems just and proper.

Respectfully submitted,  
By The Debtor

Andre Bisasor

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Dated: February 19, 2016